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UNITED STATES BANKRUPTCY COURT District of New Jersey

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ANDREW B FINBERG ESQ **STE 200** 525 RTE 73 S MARLTON, NJ 08053 Attorney for Debtor(s)

In re:

Stoney R. Bishop, Jr.

Debtor(s)

Case No. 14-19952 / KCF

Judge: Honorable Kathryn C. Ferguson

Chapter 13

## APPLICATION FOR CONSENT ORDER TO RE-CAPITALIZE DEBTOR(S) PLAN PAYMENTS TO TRUSTEE

The debtor(s) hereby request(s) in this application for entry of a consent order to re-capitalize plan payments to the trustee for the reason's set forth below:

- 1. The debtor(s) filed a Chapter 13 Petition on 05/16/2014.
- 2. By Order Confirming Plan or Modified Plan dated 9/18/14, the debtor(s) plan payments were set or modified as follows:

\$1476.00 paid to date plus \$602.00 for 56 months

- 3. As a result of adjustments to the debtor(s) account, the plan payments made to date will not satisfy the plan within the confirmed time period.
- 4. The parties hereby agree and consent to the following payment schedule for debtor(s) plan payments to the trustee:
  - \$14,731.00 paid to date (26 month[s])
  - \$602.00 for 1 month[s] beginning 8/1/16
  - \$720.00 for 33 month[s] beginning 9/1/16
- 5. This re-capitalization of the debtor(s) plan payments of the trustee does not adversely affect creditors.

WHEREFORE, the applicant requests entry of the enclosed Consent Order to Re-Capitalize Debtor(s) Plan Payments to the Trustee.